

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 22-CR-30024-SPM
)	
STEPHEN DORFMAN,)	
JOHN A. SAND)	
)	
Defendants.)	

**UNITED STATES' THIRD NOTICE OF INTENT TO OFFER CERTIFIED
DOMESTIC RECORDS OF A REGULARLY CONDUCTED ACTIVITY
PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)**

The United States of America, by and through its attorneys, Scott A. Verseman, Assistant United States Attorney for the Southern District of Illinois, and Peter T. Reed, Assistant United States Attorney for said district, respectfully submits the following Supplemental Notice of Intent to Offer Certified Records of a Regularly Conducted Activity Pursuant to Federal Rule of Evidence 902(11):

I. RECORDS TO BE OFFERED PURSUANT TO RULE 902(11)

At trial, the United States intends to offer the records listed below into evidence pursuant to Federal Rule of Evidence 902(11). For each set of records, the United States has received a certification that the records meet the requirements of Federal Rule of Evidence 803(6). The applicable Bates numbers from the discovery materials, or other location information, are provided in this notice. The first twenty-four sets of records were disclosed in the earlier notices. Also attached is a business record declaration from Carrie Zack Events, which had not been received as of the date of the earlier notices.

25. **EXHIBIT 238** Records from Aminoff and Co., consisting of information about jewelry purchases by Dorfman, and supporting documents.
26. **EXHIBIT 239** Records from Harry Winston, consisting of information about jewelry purchases by Dorfman, and supporting documents.

Respectfully submitted,

RACHELLE AUD CROWE
United States Attorney

s/ Scott A. Verseman

SCOTT VERSEMAN
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s/ Peter T. Reed

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Certificate of Service

I hereby certify that on January 26, 2024, I caused the foregoing “United States’ Supplemental Notice of Intent to Offer Certified Domestic Records of a Regularly Conducted Activity Pursuant to Federal Rule of Evidence 902(11)” to be filed with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to all attorneys of record.

Respectfully submitted,

RACHELLE AUD CROWE
United States Attorney

s/ *Scott A. Verseman*

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